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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MIGUEL S. STRASSNER,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01500-APG-NJK

JOINT STIPULATION AND ~~(PROPOSED)~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND

(First Request)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from February 21, 2019 to **April 12, 2019**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office on bereavement leave to attend funeral and prayer services following the death of her aunt. In addition, Counsel has over 80+ active social security matters that require two or more dispositive motions per week until mid-April. For example, at this time, Counsel has over 18 dispositive motions due in the month of March. As such, Counsel respectfully requests additional time to adequately review the transcript and

1 respond to the issues raised in Plaintiff's Motion. Defendant makes this request in good faith with no
2 intention to unduly delay the proceedings. Defendant apologizes for the belated request for extension,
3 but had ongoing health and personal family issues and filed an extension of time as soon as reasonably
4 practicable. The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.
6

7 Respectfully submitted,

8 Dated: February 21, 2019

/s/ Joshua Harris
(*as authorized by email on February 21, 2019)
JOSHUA HARRIS
Attorney for Plaintiff

11
12 Dated: February 21, 2019

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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19 **ORDER**

20 APPROVED AND SO ORDERED:

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22 DATED: February 22, 2019



THE HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE